

WINDELS MARX LANE & MITTENDORF, LLP

156 West 56th Street

New York, New York 10019

Tel: (212) 237-1000

Fax: (212) 262-1215

Howard L. Simon (hsimon@windelsmarx.com)

Antonio J. Casas (acasas@windelsmarx.com)

John J. Tepedino (jtepedino@windelsmarx.com)

*Special Counsel for Irving H. Picard, Trustee
for the Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities LLC
and Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Adv. Pro. No. 08-01789 (SMB)

Plaintiff-Applicant,

SIPA Liquidation
(Substantively Consolidated)

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant,

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC
and Bernard L. Madoff,

Adv. Pro. No. 12-01698 (SMB)

Plaintiff,

v.

BANQUE INTERNATIONALE À
LUXEMBOURG S.A. (f/k/a Dexia Banque
Internationale à Luxembourg S.A.), individually
and as successor in interest to Dexia Nordic
Private Bank S.A.; RBC DEXIA INVESTOR
SERVICES BANK S.A.; RBC DEXIA
INVESTOR SERVICES TRUST; RBC DEXIA

INVESTOR SERVICES ESPAÑA S.A.; and
BANQUE INTERNATIONALE À
LUXEMBOURG (SUISSE) S.A. (f/k/a Dexia
Private Bank (Switzerland) Ltd.);

Defendants.

STIPULATION EXTENDING TIME TO RESPOND

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the date by which Defendants RBC Dexia Investor Services Bank S.A.; RBC Dexia Investor Services Trust; and RBC Dexia Investor Services España S.A. (collectively, the “Stipulating Defendants”) must move, answer or otherwise respond to the complaint (the “Complaint”) filed in this adversary proceeding is extended up to and including August 29, 2014. The pre-trial conference previously scheduled for August 27, 2014 will be adjourned to October 22, 2014 at 10:00 a.m.

The purpose of this stipulated extension is to provide additional time for the Stipulating Defendants to answer, move against, or otherwise respond to the Complaint. Nothing in this stipulation is a waiver of the Stipulating Defendants’ right to request from the Court a further extension of time to answer, move or otherwise respond and/or the Trustee’s right to object to any such request.

Undersigned counsel for the Stipulating Defendants waives and expressly represents that they shall not raise any argument or objection that a request by the Trustee under the Convention of 18 March 1970 on the Taking of Evidence Abroad in Civil or Commercial Matters for the identity of the beneficial owner(s) of any account that received transfers from the redemption of shares referenced in the Complaint (the “Hague Request”) is premature. All other arguments or objections are preserved.

Except as expressly set forth herein, the parties to this Stipulation reserve all other rights and defenses they may have, including without limitation with respect to the Hague Request, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.

This stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this stipulation shall be deemed an original. This stipulation is entered into pursuant to the Order Granting Supplemental Authority to Stipulate to Extensions of Time to Respond and Adjourn Pre-Trial Conferences (ECF No. 7037) in the main case (No. 08-01789 (SMB)).

Dated: New York, New York
June 25, 2014

By: /s/ Antonio J. Casas
Antonio J. Casas (acasas@windelsmarx.com)
Windels Marx Lane & Mittendorf LLP
156 West 56th Street
New York, New York 10019
Telephone: (212) 237-1000
Facsimile: (212) 262-1215

*Special Counsel to Irving H. Picard, Trustee for
the Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC and
Bernard L. Madoff*

Dated: New York, New York
June 25, 2014

By: /s/ Philip R. Schatz
Philip R. Schatz (Philip.Schatz@wandslaw.com)
Wrobel & Schatz LLP
1040 Avenue of the Americas
11th Floor
New York, NY 10018-3703
Telephone: (212) 421-8100
Facsimile: (212) 421-8170

Attorneys for the Stipulating Defendants